

**SUMMARY OF THE
PROFICIENCY TESTING COMMITTEE TELECONFERENCE
AUGUST 25, 1998**

The Proficiency Testing Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met by teleconference on Tuesday, August 25, 1998, at 1 p.m. Eastern Daylight Time (EDT). The meeting was led by its chair, Ms. Anne Rhyne of the Texas Natural Resource Conservation Commission. A list of action items is given in Attachment A. A list of participants is given in Attachment B. *The principal purpose of the meeting was to discuss the Federal Register Notice regarding Drinking Water Methods for Certain Pesticides and Microbes.*

OLD BUSINESS

Ms. Rhyne reviewed the action items of the August 11, 1998 teleconference and assigned dates for the items to be completed. The minutes were then approved. She announced that during the teleconference on August 11, 1998, the committee selected two new members. Their membership is still subject to approval by the Board.

INTRODUCTION

Ms. Rhyne introduced and thanked Mr. Edward Glick, Ms. Caroline Madding, and Mr. Richard Reding from the Environmental Protection Agency's (EPA) Office of Ground Water and Drinking Water (OGWDW) Technical Support Center in Cincinnati, Ohio. They were invited to participate in the teleconference in order to discuss the Proposed Rule in the July 31, 1998 Federal Register (Volume 63, Number 147) entitled "National Drinking Water Regulations: Analytical Methods for Certain Pesticides and Microbial Contaminants."

Federal Register Notice Regarding Drinking Water Methods For Certain Pesticides And Microbes

A representative from OGWDW explained that the proposed rule codifies existing state requirements by specifying the method for proficiency tests (PT). The proposed rule requires that a PT be performed for each method that a laboratory uses to analyze compliance monitoring samples for drinking water. He said that it comports fairly well with Chapter 2 of NELAC's standards (Section 2.5), but is less restrictive. The new rule requires PTs once per year; NELAC requires two. Also, the requirements are per lab, not per staff member. The laboratories can use any performance-based method, as long as it can be validated (i.e., it is not limited to EPA methods).

Ms. Rhyne said that NELAC does not require PTs for each method a laboratory uses, but that the lab must choose the method by which to analyze the PT. In addition, the method chosen must be one of the methods which the lab uses on a routine basis. She stated by not requiring that a separate PT be run for each method saves on lab costs and allows for performance based methods. She said that the committee does not disagree that certifying by method (a different PT sample for each method) is better for data accountability. However, members of the PT

Committee were concerned that requiring that a PT be run for each method used would impose an additional burden of cost on the laboratories. The issue was discussed during previous NELAC interim and annual meetings, and the majority of the attendees opposed requiring PTs by method. Ms. Rhyne stated that the PT chapter was written to reflect the position held by the majority of the stakeholders. Ms. Rhyne stated that Chapter 2 of the NELAC standards, which does not require that a PT be run for each method, was voted in by the stakeholders twice.

The OGWDW responded by saying that historically, they had only received one method per laboratory and that most labs were using the same method. He also reminded the committee that the proposed rule is for drinking water only. For health reasons, laboratories are held accountable. Comments are requested during the public comment period which ends September 29, 1998. It was estimated that because of the legislative process, the rule probably would not go into effect until the year 2001. As a side comment, the representative recommended that the PT Committee define the term "routine" in the Section 2.5, to avoid ambiguous interpretations. Ms. Rhyne agreed that the term "routine" could be interpreted differently and therefore, could present a problem. The committee agreed that Section 2.5 should be revisited for possible revision.

Ms. Rhyne asked OGWDW representatives to clarify the use and number of PT samples used for compliance monitoring. In response, an example was given that for three methods, a laboratory would receive one PT sample. The lab would send in three sets of data, one for each method. One member of the PT Committee commented that some consider it "cheating" to run analyses on the same PT sample using multiple methods because it gives them multiple data points by which to "check" their results. The OGWDW representative responded that there is nothing to prevent a laboratory from running PT samples using multiple methods, if their intent is to obtain multiple data points.

A committee member pointed out that when conflicts occur between NELAC and EPA standards, then the EPA standards take precedence. NELAC wants to maintain consistency with EPA programs. Concern was voiced about NELAC's attempt to be consistent across the board for all programs. Without switching to a tiered approach, it is difficult to accommodate all the programs. The hypothetical situation in which each time an EPA regulation became effective that was more restrictive than NELAC standards, NELAC would incorporate the additional requirements was discussed. Another member commented that a "blanket" document is very difficult to achieve.

It was asked that if the proposed regulation passes, does the PT Committee wish to continue requiring PT samples twice per year? A member said that it may not be necessary to revise the NELAC standards immediately. He suggested that NELAC inform their stakeholders that they are working with the EPA on this issue, and to raise the issue for discussion with the stakeholders. Others agreed that there is time to discuss the issues with the stakeholders before coming to a final conclusion.

Ms. Rhyne stated that the PT Committee intends to submit comments and justifications on the proposed rule for drinking water methods. Ms. Rhyne said that she has drafted a letter and will send it out to committee members for review the week of August 31, 1998. She again thanked the representatives from the OGWDW for their participation in the teleconference. They also

thanked the committee, stating that this is part of the stakeholder process, and the committee's comments help them too.

OTHER BUSINESS

Ms. Rhyne raised an issue for discussion which was presented to her by a representative from a State certification authority. The issue was whether or not the current Chapter 2 requirement to pass at least 80% of the analytes present (in an organic PT), twice in a row accomplishes what the committee intended. Ms. Rhyne stated that if a laboratory can get accredited on all the compounds in a sample, by passing 80% of them, then the laboratory will be accredited for compounds (the remaining 20%) which the lab was unable to pass on the PTs. In addition, unless a standard "recipe" for PTs is required from every PT provider, the organic PTs may vary from one provider to another. As a result, one laboratory's 80% may have little similarity to another laboratory's 80%, except that both samples may be volatile organics from the same method suite. The stakeholder had expressed concern to Ms. Rhyne over the potential variation in PT data from one lab to another. One committee member stated that a solution would be to delete the 80% statement, and require that organic compounds be treated the same way as inorganic compounds. That is, a laboratory would have to pass 2 out of 3 PTs to get accredited for any analyte. It was suggested that the committee review Appendix C to revisit and simplify the text. It was noted that it probably contains verbiage that is no longer needed due to changes in EPA's National Standards. The committee agreed to review and possibly revise Appendix C.

ACTION ITEMS
PROFICIENCY TESTING COMMITTEE TELECONFERENCE
AUGUST 25, 1998

Item No.	Action Item	Date to be Completed
1.	Ms. Rhyne will send a draft of comments to the committee to review (in response to the July 31, 1998 Federal Register posting of the “National Primary Drinking Water Regulations: Analytical Methods for Certain Pesticides and Microbial Contaminants: Proposed Rule”).	September 4, 1998
2.	Submit comments to EPA (see Item 1 above).	3rd week in September
3.	Review Appendix C (and other sections?) to check for unnecessary verbiage due to changes in EPA’s National Standards (simplify text).	
4.	Revisit Section 2.5 to further define the term “routine”.	

PARTICIPANTS
PROFICIENCY TESTING COMMITTEE TELECONFERENCE
AUGUST 25, 1998

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